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ADVISORY COUNCIL ON VOCATIONAL - TECHNICAL EDUCATION

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MAY 6 1978
UNIVERSITY OF MASSACHUSETTS

**8TH
ANNUAL REPORT
1977**

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EIGHTH
ANNUAL REPORT
on
OCCUPATIONAL EDUCATION
in
MASSACHUSETTS
Fiscal Year 1977

Prepared by
The Massachusetts Advisory Council
on
Vocational-Technical Education
Suite 352-354
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ADVISORY COUNCIL ON VOCATIONAL-TECHNICAL EDUCATION

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Dr. Ernest Boyer
U.S. Commissioner of Education
U.S. Department of Health, Education
and Welfare
Washington, D.C. 20202

Through: Massachusetts Board of Education
Attention: Mr. Charles T. Grigsby, Chairperson
31 St. James Street
Boston, Massachusetts 02116

Dear Commissioner Boyer:

In accordance with the provisions of Public Law 90-576, the Massachusetts Advisory Council on Vocational-Technical Education submits its Eighth Annual Report, the final report under P.L. 90-576, covering fiscal year 1977. The report is submitted through the Massachusetts Board of Education to enable it to make such comments on our findings and recommendations as it deems appropriate.

Respectfully submitted for
the Council,



Bette V. Pinckney
Chairperson

FOREWORD

This Annual Report, the eighth since 1969, is the last Report submitted under the provisions of Public Law 90-576. The period covered by all eight Annual Reports has been one of substantial progress and change, accompanied by some controversy and frustration, but characterized for the most part by a spirit of co-operation. The Council is pleased to have had a role to play in the growth and development of occupational education in the Commonwealth of Massachusetts.

There was active planning during FY 77 to prepare for the mandates of the Education Amendments of 1976, Public Law 94-482, and the new provisions of the Law should enable the State to make further progress. The major impediment to change continues to be the State Law, Chapter 74, which is restrictive and often works counter to federal law. The Council and others will make a major effort to have Chapter 74 amended to ensure compatibility with P.L. 94-482. The Council believes that this needed change will ensure more rapid progress.

CHAPTER I

Summary of Findings, Conclusions and Recommendations

A. Introduction

While some background was provided in the Council's FY 76 Annual Report, it may be of value to review the growth and development of vocational education in the Commonwealth over the period covered under P.L. 90-576. Therefore, this last report presents data on enrollments, program changes and expenditures for the period FY 70-76, as well as FY 77 data where possible (Chapter II).

In addition, the Council has reviewed certain of its key concerns and issues over the past few years, highlighting the problems that still exist in some critical areas (Chapter III).

During FY 77, Council members and staff conducted visits to a selected number of programs in the Commonwealth. Some of these programs were concerned with urban or disadvantaged populations, and some with programs for people with handicaps (Chapter IV).

The Council remains convinced that legislative reform is still needed in the access area and that the Council can actively participate in a legislative effort to amend Massachusetts State Law governing vocational education, specifically the restrictive definition of vocational education contained in Chapter 74 of the General Laws (Chapter V).

The new Vocational Education Act, P.L. 94-482, is heavily oriented toward planning and evaluation, which reflects Congressional dissatisfaction with results under the old Law. It is the Council's position that the State Plan for occupational/vocational education should reflect the larger public policy context within which vocational education must operate (Chapter VI).

B. Findings, Conclusions and Recommendations

1. Students Served (Enrollments by Levels)

Total enrollments from FY 70 through FY 76 increased from 121,950 to 214,946, an increase of 75.6%. Postsecondary enrollments reflect the most dramatic percentage change, 160%, but secondary enrollment increases reflect where the State is allocating most of its money.

2. Enrollments by Student Profile

Male enrollments over the period increased by 81.6%, female enrollments by 71.6%, disadvantaged enrollments by 359% and handicapped enrollments by 242%. Handicapped enrollments are undoubtedly understated, since the delivery of service to that group and, to some extent to the disadvantaged, were often found in non-public school settings for a substantial portion of that period.

3. Program Enrollment

An analysis of enrollments by program areas indicates where emphasis in recent years has been placed. Growth is most dramatic in technical programs and in trade and industrial programs. Analysis of program participation by males and females still reflects a stereotyped pattern: consumer and homemaking, health and office occupations are predominantly female; technical, and trade and industrial are predominantly male. It is in these areas that substantial effort will have to be made to eliminate sex bias and stereotyping.

The construction of 26 regional vocational-technical high schools accounts for a significant portion of the growth in technical, and trade and industrial program areas. These regional schools generally operate quality programs in the regions they serve. As has been mentioned in prior Council reports, any shortcomings in the regional schools relate directly to limited services to target populations.

4. Expenditures and Allocations of Funds

While total expenditures, federal, State and local, have more than doubled over the period FY 70 to FY 76, a breakdown indicates a static pattern for federal expenditures. For every dollar the federal government gives to Massachusetts, combined State and local dollars total close to \$20. Clearly, the State and the local education agencies have made and are making a substantial commitment to vocational education. As State funds also appear to be leveling off, the burden for program maintenance and program growth clearly falls on local communities.

An analysis of expenditures by select program characteristics and levels indicates continued emphasis on expenditures in the secondary area. Postsecondary expenditures have grown considerably but still represent less than 10% of the total.

Program expenditures on programs for the disadvantaged and the handicapped are disproportionately low. This, from the Council's viewpoint, is of great concern. Substantial initiative is required in the years ahead to improve services to these two areas.

5. The Question of Quality

There is increased concern in the State and at the national level over quality assessment of services, programs and activities, but there are few models by which one can assess quality. When queried about quality, many school administrators in the Commonwealth respond with high placement statistics: successful placement has been a generally accepted measure of program success and program quality. The Council believes that the question of what is quality and how it is measured or determined should be subjected to greater scrutiny.

6. Vocational Education in Urban Areas

While there has been some improvement, the Council remains concerned over the level and quality of vocational education offerings in urban areas such as Boston, New Bedford, Fall River, Springfield and Lawrence. The Council believes that the situation in Boston, in particular, is critical. There has been little improvement in Boston in programs affecting students categorized as linguistic minority, ethnic minority, handicapped or disadvantaged. Boston Trade School is in worse shape today than in 1974. The opening of the long-awaited Occupational Resource Center has once again been delayed, with an anticipated opening not until 1979 or early 1980. Great concern has been expressed for the scope and type of programs to be offered by the ORC once it is opened.

Recognizing the critical Boston situation, in September 1977 the Council sent a letter to the Associate Commissioner of Occupational Education (Appendix E), recommending an increase in federal funds for Boston from \$1 million to \$3 million, with the provision that Boston provide varying levels of city funds in the following years.

Based on its findings and observations, the Council recommends that:

- . The Board of Education dramatically increase the level of federal funds provided specifically to Boston for FY 78 and increase aid to urban areas in general;
- . The Boston School Committee and the Boston School Department provide matching funds, on an increasing basis over the next three years, to improve the quantity and quality of vocational programs; and
- . Particular attention be paid by the Board of Education and the Boston School Committee to the special needs of unserved and underserved groups: linguistic and ethnic minorities, the disadvantaged and those with handicaps.

7. Linguistic Minority Needs and Concerns

For the past three years, the Council has been working on linguistic minority concerns through one of its sub-committees. This sub-committee's findings for FY 77 are substantially the same as they were for FY 76: bilingual education funds do not appear to be reaching linguistic minority students; teacher certification procedures appear to work against the hiring of vocational education teachers with limited English-speaking ability; teacher training programs in the Commonwealth are inadequate with respect to the needs of the bilingual community; and agencies and communities lack basic information about sources of funding.

The Associate Commissioner of Occupational Education has declared as a top priority the hiring of two professional staff to assist in resolving these inadequacies. The Department of Education has initiated a major effort to monitor and enforce laws relating to the needs of the bilingual community.

Based upon its observations and findings, the Council recommends that:

- . The Division of Occupational Education implement, as soon as possible, its plan for hiring two staff members familiar with linguistic minority concerns;
- . The Board of Education and the Department of Education consider the creation of a special project group (similar to the Alpha Group focusing on handicapped programs) to establish improved services in programs for linguistic minorities, using P.L. 94-482 and other federal funds, including CETA and Youth Employment and Training funds; and

- . The Board of Education develop effective certification procedures for linguistic minority vocational education personnel, and work with the training institutions to insure adequate instructional programs.

8. Ethnic Minority Concerns

As is true for linguistic minorities, programs and facilities for ethnic minorities are inadequate. There is a lack of effective planning for meeting the special needs of this group; there are insufficient ethnic minority teachers, counsellors and administrators, and few programs to resolve this shortage; and there is no identified plan of action to correct the situation.

Therefore, the Council recommends that:

- . The Board of Education ensure that the State Plan specifically identify those courses of action which the Board and the Department intend to initiate to improve vocational/occupational programs, services and activities for ethnic minority groups.

9. Sex Bias and Sex Stereotyping

The Council has repeatedly commented on sex bias and sex stereotyping in vocational/occupational programs and facilities in the Commonwealth. The State has initiated action in response to these concerns, and in accordance with Chapter 622 of M.G.L. and Title IX of the Education Amendments of 1972. Attitudes change slowly, however, whether they be of parents, teachers or administrators. P.L. 94-482 mandates that the Council continue to address this important concern.

The Council recommends that:

- . The Board of Education ensure that the State Plan detail what actions it intends to initiate, and what specific resources will be used (federal, State and local) to eliminate sex bias and sex stereotyping.

10. Special Needs

The Council remains concerned about the slow rate of change in attitudes of some administrators, students, parents and teachers, and has been laying the foundation for a workshop conference in FY 78 focusing on attitudinal change. The Council urges continued close attention to meeting the requirements of those with special needs and is pleased to see this as a priority in the Five-Year and Annual Program Plans.

11. Legislative Reform in Vocational Education

The Council continues to favor legislation amending Chapter 74 of M.G.L. to bring the State's statutes in line with federal legislation and Board policy. If the Board's financial reform bill, currently in the legislative process, is passed, it would accomplish this objective. Prospects for passage any time soon seem cloudy, however, and thus the Council will continue to explore, with interested groups, the possibility of a legislative proposal to amend the State's limited definition of vocational education.

12. The Planning and Evaluation Aspects of P.L. 94-482

The rewritten Vocational Education Act is heavily oriented toward planning and evaluation, which reflects Congressional dissatisfaction with the results under the old law. The new law re-emphasizes the important roll of the State Advisory Council by re-enforcing its participation in the development of a Five-Year State Plan and the Annual Program Plan. Not only is the Council's consultation roll kept intact, but the law stipulates the creation of a new plan group and designates that one of ten mandated members be "a representative of the State Advisory Council on Vocational Education, designated by that Council."

Given this new emphasis of the law, the Council believes that there is an opportunity now for meaningful systematic planning for occupational/vocational education in the Commonwealth. It is the Council's position that the State Plan should be part of a total plan for public education, and should reflect the larger social and economic policy context within which occupational education must operate.

The Council believes that specific persons should be identified in the Commissioner's Office, in the Division of Occupational Education and in the Regional Offices, to coordinate planning and evaluation activities. The Council also re-emphasizes the need for a communications network reporting back to the Board concerning local level needs, groups to be served and problems. An evaluation system built into the planning process and sophisticated enough to enable the Board to modify its objectives and priorities based on evaluation results, is also a key part of the planning process.

13. The Youth Employment Demonstration Projects Act of 1977 (YEDPA)

The YEDPA was signed into law on August 5, 1977 and initially funded with \$1 billion. The Act is a departure from programs broadly targeted at cyclical unemployment -- in particular, the dramatically high unemployment rate for minority youth -- by encouraging CETA prime sponsors and the vocational education system to experiment with different program mixes and service delivery modes.

The Advisory Council, by legislative mandate, must be concerned about the apparent failure of our educational institutions to provide career development opportunities for their students. Recognizing that the system which the Congress has designated to provide training and employment opportunities for youth is the federal-state-local network of prime sponsors created under the Comprehensive Employment and Training Act of 1973, the Advisory Council will focus its efforts and resources on helping to define and describe the contributions which Massachusetts schools can make to the CETA youth effort, utilizing the funds for in-school programs provided by the new legislation.

The Council will also want to ask the Board how it intends to maximize the use of funds available to the Commonwealth from the YEDPA for vocational education, and how these funds fit into the overall State Plan for vocational education.

CHAPTER II

Occupational/Vocational Education in the Commonwealth of Massachusetts - Selected Comparisons - FY 70-FY 77

A. Overview

FY 1977 was the final year of operation under the Vocational Amendments of 1968, P.L. 90-576. The Educational Amendments of 1976, P.L. 94-482 become effective with FY 78, ushering in a new chapter for vocational education in the State and in the nation. While Chapter V of this report provides a broader look at what the federal legislation is and what its potential impact might be, it is clear that new directions are provided, new initiatives must be taken and new and expanded responsibilities are given, both to the Board of Education and to the State Advisory Council.

While some background data was provided in Part II of the Council's FY 76 Annual Report, it may be of value to review the growth and development of vocational education in the Commonwealth over the period covered under P.L. 90-576. Selected comparisons will be presented concerning enrollments, program changes and funds expended. In most cases, data covers the period FY 1970-FY 1976, but FY 77 data will be presented where possible.

B. Students Served (Enrollments by Levels)

Table I presents vocational education enrollments in Massachusetts for the period FY 70 through FY 76. Because the FY 70 enrollment figures apparently include elementary level enrollments not adequately explained in the Division of Occupational Education's Annual Report for that year, growth comparisons are limited to the FY 71-FY 76 period. Data include enrollments by level (secondary, postsecondary and adult).

Total enrollments during the six-year period increased from 121,950 in FY 71 to 214,946, an increase of 75.6%. The most significant growth took place between FY 71 and FY 72, but may be distorted due to reporting basis changes. Within the three levels represented, postsecondary enrollments reflect the most dramatic percentage change, 160%; but the secondary enrollment increases reflect where the State is allocating most of its funds.

TABLE I
Vocational Education Enrollments By Level - Massachusetts
FY 70-76

<u>Year</u>	<u>Secondary</u>	<u>Postsecondary</u>	<u>Adult</u>	<u>Total</u>
FY 1970 ^a	82,817	16,497	66,404	165,718
1971 ^b	95,411	8,711	17,828	121,950
1972	121,684	13,019	29,096	163,799
1973	131,750	14,322	29,986	176,058
1974	143,308	16,713	26,895	186,916
1975	148,496	19,691	30,877	199,064
1976	155,106	22,562	37,278	214,946

^a For FY 1970 only, "secondary" comprises both elementary and secondary.

^b For FY 1971 only, "estimated" enrollment. All other years are actual enrollments

Source - Div. of Occ. Ed. Annual Report FY 70-76
Trends in Vocational Education, Div. of Occ. Ed., Oct., 1976

The enrollments by student profile detailed in Table II (male/female, disadvantaged, handicapped, native American) show a different dimension of growth. Male enrollments over the period increased by 81.6%, female enrollments by 71.6%, disadvantaged enrollments by 359% and handicapped enrollments by 242%. Handicapped enrollments are undoubtedly understated since the delivery of services to that group and, to some extent to the disadvantaged, were often found in non-public school settings for a substantial portion of that period. While the male/female breakdown (47.9% male, 52.1% female for FY 76) suggests that females are not underserved, it must be remembered that the largest female enrollments are in the office, business and health-related programs.

Raw enrollment statistics tend to produce a distorted or inaccurate view of educational effort. That is, unless some method of using full time equivalents as an enrollment measure is developed, one is likely to be comparing one female enrollment in a business program under which the student may be getting two hours of instruction, with one male enrollment in a construction cluster, in which the student may be getting five or six program hours of instruction. While the State is moving ahead with its mandate under P.L. 94-482 to eliminate sex bias and sex stereotyping, an analysis of enrollments historically reflects traditional stereotypic enrollments. Major efforts underway, coupled with the new mandates of federal and state law will alter this situation in the future.

C. Program Enrollment

Analysis of enrollments by program area, Table III, indicates where emphasis in recent years has been placed. While office occupations account for the largest proportion of total enrollments, technical and trade and industrial programs show the most substantial continued growth over the period covered. As indicated in the previous section, analysis of program participation by males and females still reflects a stereotypic pattern: consumer and homemaking, health and office occupations are predominantly female; technical and trade and industrial are predominantly male. It is in these areas that substantial effort will have to be made to eliminate sex bias and stereotyping.

The construction of 26 regional vocational technical high schools accounts for a significant part of the growth in technical and in trade and industrial programs. In previous reports the Council has observed that any shortcomings in these

regional schools relate directly to limited services to the disadvantaged, the handicapped and to ethnic and linguistic minorities, since the schools tend to be located in suburban areas. In the future, there must be greater emphasis on improved services, programs and activities for urban areas which have an inadequate delivery system.

TABLE II

Vocational Education Enrollments by Student Profile - Massachusetts
FY 1970 - FY 1976

<u>Year</u>	<u>Total</u>	<u>Male</u>	<u>Female</u>	<u>Disadvantaged</u>	<u>Handicapped</u>	<u>Native American</u>	<u>Black</u>	<u>Oriental</u>	<u>Spanish Surname</u>
FY 1970	165,718	79,365	86,353	615	77	N/A	N/A	N/A	N/A
1971	121,950	56,727	65,223	3,478	813	63	5,414	378	1,677
1972	163,799	73,905	89,894	6,948	2,669	228	8,667	439	2,269
1973	176,058	N/A	N/A	8,122	1,642	N/A	N/A	N/A	N/A
1974	186,916	N/A	N/A	12,274	1,505	N/A	N/A	N/A	N/A
1975	199,064	90,155	108,909	11,618	1,946	128	12,688	1,364	4,015
1976	214,946	103,011	111,935	15,961	2,772	212	12,693	1,270	4,442

TABLE III

Vocational Education Enrollments by Program - Massachusetts

FY 1970 - FY 1976

Year	Total	Agriculture	Distrib. Educ.	Health	Consumer & Homemaking	Occ. Prep.	Office	Technical	Trade & Industrial	Special ^b Programs
FY 1970 ^a	165,718	3,311	3,379	869	29,481	3,882	72,776	889	27,899	0
1971	121,950	983	3,984	3,046	4,727	2,242	70,911	2,006	33,534	517
1972	163,799	2,149	6,628	4,382	16,055	3,088	79,962	4,676	43,216	3,633
1973	176,058	2,725	7,456	6,417	15,358	8,008	86,000	4,641	43,056	2,397
1974	186,916	3,145	7,186	6,292	17,829	7,379	86,795	6,164	49,384	2,742
1975	199,064	3,390	8,342	7,513	20,747	5,828	89,061	6,448	50,491	7,244
1976	214,946	4,120	9,503	8,358	21,092	6,302	91,925	7,390	57,548	8,708

^a Source for 1970 data - letter dated 1/26/71 to Dr. Charles Buzzell from Mr. Walter Verney.

Source for FY 71- FY 76 - Div. of Occ. Ed. Annual Reports

^b Special Programs include: group guidance, pre-postsecondary, remedial and other.

D. Expenditures and Allocation of Funds

Total expenditures, federal, state and local, have more than doubled over the period FY 70-FY 76 (Table IV). In FY 70, a total of a little over \$100 million was expended for vocational programs; in FY 76, the reported expenditure level was \$219 million, a substantial growth pattern. The breakdown by federal and State/local reflects a static pattern for federal expenditures (allocations by DHEW to Massachusetts) and a dramatic State/local growth pattern. For every dollar the federal government gave to Massachusetts in FY 77, combined State and local dollars total close to \$20. Clearly, the State and local education agencies have made and are making a substantial commitment to vocational education. As State funds also appear to be leveling off (and if inflation is considered, actual State support has decreased), the burden for program maintenance and program growth falls on local communities.

In early FY 77, the Massachusetts Legislature's Post-Audit Committee released its report on expenditures for vocational education. The report concluded that the "lion's share" of funds was going to a limited number of regions at the expense of urban and rural areas. The Board of Education has taken steps to reverse the allocation pattern for FY 77 and for FY 78.

An analysis of expenditures by select program characteristics and levels (Table V) indicates continued emphasis on the secondary area. Postsecondary expenditures have grown considerably, but still represent less than 10% of the total. Program expenditures on programs for the disadvantaged and the handicapped are disproportionately low and appear to be basically the set-aside amounts mandated under P.L. 90-576. From the Council's viewpoint, this is of great concern. Substantial initiative is required in the years ahead to improve services to these two areas.

While P.L. 94-482 suggests that increased federal funding will be provided for vocational education during the next five years, the uncertainty of the appropriations bill, stalled in Congress at this point, makes any prognosis impossible. State and local funding patterns are also difficult to predict. Substantial new funds appear to be unlikely. As a result, the Board of Education will be forced to consider its priorities more realistically and to rely on better distribution and allocation of resources, both human and financial, to sustain current levels of service and programs, and to provide improved services and programs to those who previously have been unserved or underserved. Such allocation decisions and likely readjustments will cause some major changes in the current delivery system.

TABLE IV
Actual Vocational Education Expenditures by Funding Sources - Massachusetts
(in thousands of dollars)
FY 1970-1976

<u>Year</u>	<u>Total</u>	<u>Federal</u>	<u>State/ Local</u>	<u>% Change Over Prior Year</u>	<u>% Spent for Secondary Programs</u>	<u>% Spent for Postsecondary Programs</u>	<u>% Spent for Adult Programs</u>
FY 1970	100,150.7	3,777.4	96,373.3	--	73	17	1
1971	122,084.9	9,737.0	112,347.9	21.9	92	6	2
1972	128,815.4	10,243.2	118,572.2	5.5	89	9	2
1973	145,390.1	12,586.0	132,804.1	13.0	87	10	2
1974	158,105.2	9,442.9	148,662.4	9.0	70	9	2
1975	179,617.2	9,844.8	169,772.4	14.0	71	9	2
1976	219,089.4	10,269.4	208,820.0	22.0	71	9	2

Source: Div. of Occ. Ed. Annual Report (1st 3 columns)
Tabulations - Council Staff

TABLE V
Actual Vocational Education Expenditures by Program Characteristics

Massachusetts - FY 1970-1976

(in thousands of dollars)

<u>Year</u>	<u>Total</u>	<u>Secondary</u>	<u>Postsecondary</u>	<u>Adult</u>	<u>Disadvantaged</u>	<u>Handicapped</u>
FY 1970	100,150.7	73,251.9	17,242.7	1,286	1.1	381.2
1971	122,084.9	112,198.0	7,393.0	2,496	N/A	N/A
1972	128,815.4	114,780.0	11,475.0	2,560	N/A	N/A
1973	145,390.1	126,853.0	15,222.0	3,313	N/A	N/A
1974	158,105.2	111,048.0	14,304.0	2,625	3,541.0	1,510.7
1975	179,617.2	127,181.0	16,288.0	2,955	3,877.0	1,879.7
1976	219,089.4	155,458.0	19,771.0	3,611	4,625.0	2,333.4

Source: Div. of Occ. Ed. Annual Reports

E. What About Quality?

There is increased concern in the State and at the national level over quality assessment of services, programs and activities. And there are few models by which one can assess quality. It has been suggested by some educators that a student's program focus and placement in a job are directly related and represent one measure of quality. This is a tenuous yardstick at best, for if one believes in career change, the development of transferable skills has some effect on job placement.

When queried about quality, many school administrators in the Commonwealth respond with high placement statistics: successful placement has been a generally accepted measure of program success and program quality. The Council does not dispute the belief that many schools are offering quality programs, but the Council does believe that the questions of what is quality and how is it measured or determined should be subjected to greater scrutiny. In a period of limited resources, it is important that measures of program quality be developed and applied to determining program (resource use) effectiveness.

CHAPTER III

A Review of Selected Council Concerns

FY 70-FY 77

A. Overview

Over the past few years, the Council has identified a number of issues, concerns and problems its members have focused on during the planning and evaluation activities it has carried out under P.L. 90-576. Concerns ranged from lack of research and data on critical elements of the system (student follow-up, cost data, etc.) to problems relating to certain categories of people either unserved or underserved by the current delivery system in the Commonwealth.

A substantial number of recommendations have been submitted to the Board of Education during the period covered by P. L. 90-576, and although the Board of Education has been increasingly responsive to the Council's recommendations in virtually all of the areas covered by these recommendations, there are still problems in some critical areas, which will be highlighted and discussed in this chapter. In its FY 76 Annual Report (Part II) the Council did present its assessment of Board action on recommendations to that point.

B. The Remaining Urban Crisis

In its Annual Report for FY 73, the Council included a section entitled "Urban Occupational Education: A Profile of Boston". Some of the findings were presented as follows:

Vocational education in Boston has been stagnant and unimaginative for years. For an urban area with large manpower and unemployment problems, Boston has been receiving a very small proportion of federal and State funds. For a city with large disadvantaged and handicapped populations, Boston has been providing an inadequate amount of vocational training on secondary levels. At the most, vocational education in Boston is reaching 12% of the high school students.....Linguistic minority students demonstrate a real need for vocational training and comprehensive career education, yet receive little...

The Chapter also alluded to the needs of ethnic minority groups being denied access to quality vocational programs, largely because there was a lack of adequate facilities and programs to serve their needs.

Since 1973-74, there have been some improvements: an Associate Superintendant of Occupational Education has been appointed (1976); the assistance of what was referred to as the "Business Partnership Program" in 1973, now called the "Tri-lateral Council for Quality Education", has been expanded and reaches more students and individual schools; increased federal funds under P.L. 90-576 have been provided; the State Department of Education, in its policy statement on occupational education (1976), recognized the problem and stated that resolution of this crisis is a top priority; career awareness programs for those with handicaps are being launched; and increased public awareness of this crisis is evident.

These improvements, however, have not significantly altered the current status of vocational/occupational education in Boston. While the future may be substantially brighter, the situation in 1977 remains critical. There has been little improvement in programs affecting students categorized as linguistic minority, ethnic minority, handicapped or disadvantaged. Boston Trade School is in even worse shape than it was in 1974. The opening of the long-awaited Occupational Resource Center has once again been delayed, with an anticipated opening not until 1979 or early 1980. Great concern has been expressed for the scope and type of programs to be offered by the O.R.C. once it is opened.

While the Council believes that the urban crisis is most evident in Boston, it does not propose that the focus for urban funding and improvements be limited to Boston. Facilities and programs in most other urban areas (Lowell, Lawrence, New Bedford, Fall River, Springfield, etc.) are better than in Boston, but services to ethnic and linguistic minority groups, the handicapped and the disadvantaged badly need increased attention and more aggressive action.

Recognizing the critical Boston situation, in September of 1977, the Council sent a letter to the Associate Commissioner of Occupational Education of the Department of Education, (Appendix E), recommending increased federal funds for Boston - from a level of \$1 million to \$3 million - with the provision that Boston provide varying levels of city funds in the following years. While funds alone do not solve critical gaps in facilities and services, they can provide some positive help if, when coupled with more effective leadership, quality improvements should occur.

Based on its findings and observations, the Council recommends that

- . The Board of Education dramatically increase the level of federal funds provided specifically to Boston for FY 78, and increase aid to urban areas in general;
- . The Boston School Committee and the Boston School Department provide matching funds on an increasing basis over the next three years to improve the quantity and quality of vocational programs; and,
- . Particular attention be paid by the Board of Education and the Boston School Committee to the special needs of unserved and underserved groups: linguistic and ethnic minorities, the disadvantaged and those with handicaps.

C. Linguistic Minority Needs and Concerns

For the past three years, the Council has been working on linguistic minority concerns through one of its sub-committees, involving other private and public agencies and individuals sharing similar concerns. This sub-committee met frequently during FY 77 and is continuing to meet. The findings of the sub-committee during FY 77 do not differ substantially from those included in the Council's FY 76 report:

- (1) Bilingual vocational education funds do not appear to be reaching linguistic minority students;
- (2) CETA (vocational education) funds do not appear to be reaching linguistic minority people;
- (3) Teacher certification procedures appear to work against hiring vocational education teachers and counselors with limited English-speaking ability;
- (4) Some teacher training programs in the Commonwealth do include courses for teachers of bilingual or bi-cultural students, but they are not adequate; and
- (5) Agencies and communities lack basic information about the role and organization of occupational education and about the availability of federal and State funds for bilingual vocational education.

There is evidence that there is an increased level of CETA funds going into bilingual or English as a Second Language programs. The Board of Education has awarded funds, through Fitchburg State College, to increase the supply of bilingual teachers. Recognizing staff capability to develop bilingual programs and to provide technical assistance, the Associate Commissioner of Occupational Education, in a meeting with the Council's sub-committee on linguistic minorities, declared as a top priority the hiring of two professional staff to assist in resolving these inadequacies. The Department of Education has initiated a major effort to monitor and enforce laws relating to meeting the needs of those with special needs, which should result in more effective recruiting of, and programs for, special needs students.

Based on its observations and findings, the Council recommends that

- . The Division of Occupational Education implement, as soon as possible, its plan for hiring two staff members familiar with linguistic minority concerns;
- . The Board of Education and the Department of Education consider the creation of a special project group (similar to the Alpha Group focusing on handicapped programs) to establish improved services and programs for linguistic minorities with P.L. 94-482 and other federal funds, including CETA and Youth Employment and Training funds; and
- . The Board of Education develop effective certification procedures for linguistic minority vocational education personnel and work with the training institutions to insure adequate instructional programs.

D. Ethnic Minority Concerns

From 1975 to 1976, there was no perceptible increase in ethnic minority enrollments (refer to Chapter II, Table II) in vocational education programs, and little improvement is likely in the 1977 school enrollments. Since ethnic minorities tend to be in urban areas (Boston being the largest) inadequate facilities and programs, with little improvement during the past five years, would tend to keep enrollments down. As is true for linguistic minorities, programs and facilities for ethnic minorities are inadequate; there is a lack of effective planning for meeting the special needs of this group; there are insufficient ethnic minority teachers, counselors and administrators and few programs to resolve this shortage; and there is no identified plan of action to correct this situation. Therefore, the Council recommends that

- . The Board of Education ensure that the State Plan specifically identify those courses of action which the Board and Department intend to initiate to improve vocational/occupational programs, services and activities for ethnic minority groups.

E. Sex Bias and Sex Stereotyping

In each of its Annual Reports over the last few years, the Council has commented on sex bias and sex stereotyping in vocational/occupational programs and facilities in the Commonwealth. The passage of Chapter 622 (1971), Title IX of the Education Amendments of 1972, and the more recently enacted Education Amendments of 1976, Title II, make it clear that there has to be a major effort to eliminate sex bias and stereotyping. The State has initiated action in response to these mandates, and some progress already is evident. Attitudes, however, whether they be of parents, teachers or administrators, are slower to change. The Department of Education has commenced a monitoring program involving some 51 schools operating occupational/vocational programs, to determine compliance with these laws, as well as with others involving discrimination of varying kinds. The Council intends to watch closely the results of the monitoring process; since the elimination of sex bias and stereotyping is one of the four basic purposes of Title II of P.L. 94-482, the Council has a mandate to continue to address this important concern. The Council recommends that

- . The Board of Education ensure that the State Plan detail what actions it intends to initiate, matched against specific resources (federal, State and local) to be used, to eliminate sex bias and sex stereotyping.

F. Special Needs

For the past three years, the Council has had a sub-committee working on access to programs and facilities and on the provision of services to those with handicaps. The Alpha Group, a special project set up within the Department of Education, has worked diligently to promote programs. Real progress is evident and the Board and Department are to be commended for their efforts.

The Council remains concerned about the slow rate of change in attitudes of some administrators, students, parents and teachers, and has directed its efforts in FY 77 toward laying the foundation for a workshop/conference in FY 78 focusing on attitudinal change. The target date for the conference is late January or early February and will be based on special audio-visual material in the process of being developed.

The Council urges continued priority attention to meeting the requirements of those with special needs and is pleased to see this as a priority in the Five-Year and Annual Program Plans.

CHAPTER IV

A Review of Selected Occupational Programs - FY 77

A. Introduction

During FY 77, Council members and staff conducted a limited number of visits to a selected number of programs in the Commonwealth. The projects were selected from a list of some 20 programs involving different types of sites, different stages of program development, varying degrees of federal financial support, alternative delivery systems, and different target populations. The underlying questions the Council sought to address were: What happens to a project or program when federal funds are no longer available or are in the process of being phased out or reduced? Do LEA planners initially think about mainstreaming the project or program, knowing that at some point federal support will cease? While limited visits provide no solid answers, the visits did produce some insights into these questions. The Council intends to plan a more extensive series of program visits in FY 78. Appendix D contains the interview guide used by the evaluation teams.

B. Program Visits

1. Project Space (Education Collaborative)

Project Space was devised in 1969 to provide an alternative vocational education delivery mode for students who could not cope with the normal education system, for students in the process of alienation, for those not attuned to what was available in existing vocational education programs, for students being "pushed out" and for students requiring special programs for a variety of reasons. The program was designed to attract these students back to learn specific employable skills.

Initially, the program involved seven schools and was totally funded by federal monies. Now, the program involves eleven schools plus the Catholic Archdiocese, and funding for FY 78 will be largely the responsibility of the local education agencies, with continued assistance likely through the Division of Equal Education Opportunity and from the Division of Special Needs.

Students receive academic instruction in the morning and, for approximately four hours in the afternoon, receive "hands on" experience in business/industrial or governmental office settings, for which they are paid at least the minimum wage. The U.S. Department of Transportation, Honeywell and Liberty

Mutual initially committed themselves to accepting fifteen students each. Teachers and counsellors are provided by EdCo.

From a first year total of 45 students, the program has grown to about 200 students and has been endorsed by the Board of Education. The Division of Occupational Education has stated that the program is replicable and EdCo staff has been involved in attempting to start a similar program in Worcester.

Of the average graduating group, 40% go on to further their education; 40% enter full time employment and 20% either go into the military, get married or contact is lost with them in terms of determining placement. Project staff admit to lack of adequate follow-up on address changes.

Business/industry involvement has generally been good. One company admits to spending approximately \$30,000-\$35,000 a year for students it receives. These costs include supervisory assistance and wages paid to students.

"Hands on" work experience includes position such as computer operators, photographic assistants, crystal lab technicians, inventory control and clerical/secretarial jobs.

While there is general agreement that funding sources must shift from basically federal to primarily local, there is some concern over loss of momentum, decrease in services and increase in communication problems as the co-ordinator becomes involved with a number of LEA's (school and finance committees). The cost per student was estimated at \$2,200.

There have been minor problems with some initial work assignments, but in general the counsellors, with assistance from those at the work site, have been able to find or develop different jobs to meet student needs.

The program appears to be an example of one that benefitted from federal seed money and one which will find its way into the educational delivery system as a viable alternative. There appears, from our observations and from comments from program staff, to be a need for a more active role by the State Department in terms of technical assistance, dissemination of program information, publicity and state funding (not necessarily all education funds).

2. Project Bold (Cape Cod Tech.)

Project Bold, in its second year, was offered to 24 visually impaired students, ages ranging from 13-18, with impairment ranging from 20%-80% to total blindness. Of the total, 17 were classified as legally blind; two were totally blind.

The primary objectives of the program were to (1) demonstrate that visually impaired students could benefit from and were capable of receiving vocational education; and (2) explore a broad variety of vocational options (auto mechanics, carpentry, etc.). Each student is allowed to explore a different vocational area each of the first three weeks, with the fourth week to re-explore a previous vocational area.

Project Bold is a summer program, after which each student is evaluated by the shop instructor, Alpha staff and a teacher of the visually impaired. For those desiring to pursue vocational education, the Alpha Group provides follow-up services which include advocacy and program development. Five students in the program received these services and are enrolled in vocational programs at the time of this writing. For two students finishing high school, the evaluation is being used to help develop their vocational rehabilitation plans. Eight students who entered the 8th grade in September, 1977 are interested in embarking on a vocational program when they reach high school. The Alpha Group will assist them in securing program placement.

Alpha staff will also engage in statewide inservice training in vocational programming for teachers of the visually impaired and will develop assessment procedures for the teachers, to be used in conjunction with occupational/vocational exploratory programs at the middle school level.

Council visitors were impressed with the project staff, the dedication of the instructors and the enthusiasm of the students. The program appears to be adaptable to a much broader group of students with special needs.

3. Protestant Guild for the Blind (ARTS)

The fast-growing computer industry has provided new training and career opportunities to people who are handicapped, including many jobs once considered "too complex" for them. Levels of income have increased accordingly. Thus the Council was interested in observing first-hand a program designed to

permit people with severe or total vision loss to store and retrieve information through a telephone-linked computer system. In addition to providing rapid access to the printed word, such a program could expand research opportunities and open new employment opportunities to blind people.

The name ARTS is an acronym for Audio Response Time Sharing and refers to a "talking" computer developed jointly by the Protestant Guild for the Blind, Inc. and American Systems, Inc. According to Mr. Peter Duran, Director of the ARTS program and himself totally blind, "The audio-response feature makes using a computer system as convenient for the visually handicapped as for other persons."

The ARTS computer is contacted through an ordinary telephone by attaching the receiver to a portable keyboard resembling that of an electric typewriter. The user types commands to the computer which responds with spoken words heard through a keyboard speaker. Mr. Duran told us that the computer presently has a vocabulary of over twelve thousand words.

In addition to arithmetic and algebraic operations, with answers spoken by the computer, ARTS services also include typing and editing, production of copy in either print or Braille, and alphabetizing. The system is accessible 24 hours a day, seven days a week.

The technology developed by this grant gives the handicapped individual superior access to the printed word. Such access serves as an educational tool, in the sense that it enhances both expressive and receptive language. Having access to a computer obviously improves vocational opportunities for people who are blind, and also expands the potential for avocational or leisure time pursuits.

Although admirable in its development and refinement, the ARTS system does not solve a major problem. This kind of technology remains beyond the fiscal reach of most people who are handicapped (as well as those who are not handicapped). Until such time as federal, State or private subsidies can alleviate the high cost of such technology, it will not be available to people who are most in need of it.

4. Chelsea Soldier's Home

Northeast Metropolitan Regional Vocational School operates two major programs for handicapped students. One program is

located at the school in Wakefield. It serves students who are not severely handicapped and instructs them, within the regular school structure, in basic life skills, food service, auto body and business/office skills. Additionally, students receive training in horticulture and plant maintenance. This program serves 115 students, selected primarily from the 12 member communities which comprise the entire student population.

The second program, the one visited by the Council, serves students who are more severely handicapped. Located at the Quigley Building at Chelsea Soldiers' Home, this program emphasizes primary service skills such as food service aide, janitorial, interior painting and cleaning. All students work under supervision and their vocational education is supplemented by remedial or developmental work in language arts, speech and motor development.

The Soldier's Home Program was begun in February, 1976, but not fully operational until fall of that year. Several participating students are residents of a State school for the mentally retarded, and the program receives fiscal support for them from the Bureau of Institutional Schools, Massachusetts Department of Education.

A number of problems were encountered during the development phase of the program. Those considered to be most significant included:

1. Finding a program site, since no space was available at the regional vocational technical school;
2. Selection of staff who were knowledgeable in both special and vocational education;
3. Cash-flow problems with the State contracting system.

This program underscores the value of all students having access to appropriate vocational education, regardless of ability/disability levels. Under earlier educational philosophies, similar students probably would have been denied the opportunity to participate in such a program. Here, these students are learning functional skills which will prepare them for independent or semi-independent employment and daily living skills. It is hoped that this program can soon be located within the school community itself so that these students may have an even wider range of vocational learning options as well as the enjoyment of being part of a school community.

5. Blue Hills Regional Vocational School

Council staff visited the Blue Hills Regional Vocational School to observe the on-going program for students with special needs. This program is markedly different from other sites visited because no federal funding currently supports the program. Although initially funded through P.L. 90-576, the entire operating budget is now subsumed in the school budget and a system of tuition payments made for students from non-member communities. Located in Canton, the school serves students from Avon, Braintree, Holbrook, Randolph and Norwood. The program began in 1969 and is respected for being one of the first special needs programs within a regional vocational technical school in Massachusetts.

An adjunct program, established this year, is supplemented with funds through P.L. 92-318. Called "The Transitional Program for Lower Achieving Students with More Substantial Special Needs", the program seeks to provide vocational education and occupational work experience within the school setting for moderately to severely handicapped students. 130 male students and 50 female students, ages 14-21, are enrolled in a dual program of academic and vocational studies. The daily program permits a full school day of 6½ hours. Students are trained primarily in food services. They are taught skills required for employment as dishwashers, busboys and kitchen helpers. Although federal funding was requested for only one year, the program will continue at the conclusion of the grant period, June, 1977. The program has proved so successful that three 20-year-old students will be working in the community on a part-time basis. A counselor is being added to the staff to provide follow-through services for those students placed in occupational work experiences outside the school setting.

Students are selected for this program as a result of referrals made by Administrators of Special Education of their home school districts. Student interviews, program visits and a review of the student's Core Evaluation support the selection process.

Parent and community support has been excellent. Parents are invited to regularly scheduled meetings with staff. A brochure has been prepared for community employers and interested citizens or school personnel. Community support is expected to become even stronger with the establishment of an Advisory Council for the 1977-78 academic year.

The need for such a program was determined by an informal regional assessment of available services to this group of students. The Director of Special Education, in collaboration with neighboring special needs administrators and regional collaborative directors, ascertained the student need and program need in their geographic areas.

Dr. Ronald Linari, Project Director, emphasizes the growth which most students experience. Elementary school programs tend to emphasize gross and small motor development and basic reading and writing skills, but often fail to offer meaningful job-related skills. One of the apparent reasons for the success of the program is the individual and daily supervision provided to each student, as well as the matching of curriculum to the manpower needs and projections of the surrounding geographic area.

C. Observations and Conclusions

The Council is aware that visits to five or six programs do not constitute more than a cursory basis for drawing major conclusions or providing firm answers to the questions raised in the introduction to this chapter. However, some of the comments made by program administrators and some of the problems we observed should be noted:

- . In some instances, late funding decision notification, whether favorable or unfavorable, resulted in a disruption of those planning processes used by LEAs.
- . Often, LEA administrators were not provided with an adequate rationale as to why their programs were not funded, or were funded below the level originally requested. Several administrators would like to have had technical assistance to come up with a better proposal on the assumption that their project had merit but for some reason did not meet the criteria established by the State.
- . Several administrators raised questions about the exhaustiveness and adequacy of program evaluations. Some believed that the process was more dependent on the beliefs of the evaluator than on the validity of criteria used in the evaluation.
- . There were many favorable comments about improvements in Department of Education assistance through the creation of the regional education offices.

The Council has been concerned for several years both with the planning process and with the process and procedures surrounding the evaluation of and funding decisions of federally supported programs and projects. The Council concludes that improvement in these processes and procedures should be made, and will investigate the process with the idea of recommending changes in FY 78.

CHAPTER V

Legislative Reform in Vocational Education

A. Introduction

During the past several years the Council has sustained an interest in the amorphous concept of equal access opportunity to vocational education in Massachusetts. Certain target populations, notably women, disadvantaged, blacks and other minorities, handicapped and bilingual persons, have been historically under-represented in quality vocational education programs. Another facet of the access problem is that federal and State vocational education funding patterns have generated an inequitably low financial distribution to urban vocational schools.

The legislative proposal developed by the Council last year evolved from a triadic approach to meet the access issue. The proposal included legislative mechanisms to deal with three pervasive inadequacies in the vocational education system in Massachusetts -- outdated vocational education program offerings, limited access opportunities to vocational programs and inequitable funding allocations.

To overcome the problem of outdated vocational education offerings, Council legislation proposals would have redefined approvable vocational programs under Chapter 74. The new definitions essentially would have brought the State law into harmony with federal legislation which has a more liberal and forward-looking definition. This effort to redefine approvable programs will be continued in FY 78.

Regarding current inequities in funding allocation patterns, the Council's proposed legislation would have introduced a penalty/reward system concerning the implementation of vocational education opportunities (programs, facilities and services); and would have altered the funding formula based on the "affluence" of a community with a base of 50%, but permitting "poorer" communities to receive State funds in excess of the base 50%. Specific details had not been fully completed.

Concerning limited access and the need to provide more and better programs, facilities and services to the unserved and underserved, the Council's legislative proposal would have provided incentives to encourage the development of alternative delivery systems for which the legislation filed by the Minute Men Regional Vocational Technical High School district is an example. Their proposal was based on the California regional occupational program concept.

Throughout the year, Council members discussed the specific proposal as well as the general concepts behind the proposal with various groups such as the Massachusetts Department of Education, State legislators, vocational education teachers and numerous State and local public interest organizations. At the conclusion of a series of these meetings, the Council perceived that the consensus by the participants was that the basic observations and tenets upon which the legislation was drafted were valid, but that there was a lack of agreement and enthusiasm on the propriety of several specific legislative proposals. Upon further deliberations, the Council decided to pursue vocational education via the legislative route but with more immediately achievable goals and objectives. Although the premise of the original omnibus bill was laudable and although it approached the access issue at its most vulnerable points, Council members felt that the intense and long range advocacy commitment required for such a comprehensive piece of legislation exceeded manageable standards for such a Council with an ever-rotating membership. Nor were Council members in agreement concerning several legislative mechanisms within the proposal.

Nevertheless, the Council was heartened by the participants input and sensitivity to the fundamental barriers to equal access opportunities to quality vocational education programs and we are hopeful that the dialogue initiated at these meetings among such diverse groups will continue.

B. Plan of Action

The Council remains convinced that legislative reform is still needed in the access area and that the Council can actively participate in a legislative effort to amend Massachusetts state law governing vocational education, specifically the restrictive definition of vocational education contained in Chapter 74 of M.G.L. As the Council reported last year, various State studies noted a system whereby vocational course offerings are not regularly reviewed to meet changing social and economic conditions resulting in vocational programs of disparate quality and quantity throughout the Commonwealth.¹

1. Massachusetts Advisory Council on Vocational-Technical Education, 7th Annual Report, 1976, pp. 9-10.

Our enthusiasm for going forward with the definitional change was bolstered by the overwhelming positive response we received by discussion participants to the definitional reform portion of the original proposal. Typical of the observations of many participants concerning this aspect of the access issue was a comment made by a vocational school superintendent concerning the obvious dichotomy between the federal and State approach toward vocational education. He noted that he was unable to receive State funding after the federal "seed money" was exhausted, because the specific programs could not be compartmentalized into the State's traditional definition of an approved vocational education program. The Council's redefinition of vocational education aims towards eliminating this type of waste.

1. Expanding the Definition of Vocational Education

Last year the Board of Education noted that the restrictive State law defining vocational education is inconsistent with flexible federal guidelines that can more easily accommodate programs for new and emerging occupations.² Also, the Massachusetts definition perpetuates the continuance of outdated programs both legislatively and administratively. Despite changes in technology, employment opportunities, student needs and educational philosophy, the State definition of vocational education is virtually the same today as it was when the definition was first enacted into legislation in 1911. Vocational education in Massachusetts consists of programs in the following categories only: distributive occupations, industrial arts, practical arts, agricultural and household arts. This year the Department of Education revamped the administrative regulations governing the State's vocational education laws. Although the final regulations include no provisions that would expand the rigid definitional categories under the State's vocational education law, the Council believes that legislative and not administrative amendments to the existing structure offer a more appropriate vehicle for reform. The Council looks forward to working closely with the Division of Occupational Education which has expressed an interest in studying this problem.

In the past, the federal government defined vocational education by categories in much the same way Massachusetts

2. Board of Education, Policy on Occupational Education, May, 1976, p. 21

does today. Yet, when comprehensive federal studies concluded that vocational course offerings were inadequately preparing people for gainful employment in emerging occupations, the federal government, in 1963, cast aside the restrictive categorical program approach and replaced it with a more time resistant definition which highlights target populations to be served as well as program categories. The Vocational Education Amendments of 1968 and 1976 continued the same broad spirit concerning what constitutes vocational education. We believe that the time is ripe to introduce parallel State legislation to modernize Massachusetts' antiquated concept of vocational education.

2. Conclusion

During the next year, the Council plans to continue working with interested groups in developing and sponsoring a legislative proposal amending the State's limited definition of vocational education. In this way, vocational education students will have greater access to a wider range of education opportunities.

C. Recommendations

The Council recommends that

- . The Board of Education adopt as a legislative priority for FY 78, amending the definition of vocational education programs contained in Chapter 74 of M.G.L., to bring the State's statutes in line with federal legislation.

CHAPTER VI

A Look Ahead: The Potential Under P.L. 94-482 and Other Federal Legislation

A. Background

In 1975 Congress held hearings to assess the impact of federal aid on state vocational education programs. The hearings revealed that, while in general the Vocational Education Act (VEA) had proven to be sound legislation, there were some problems. For example, a General Accounting Office survey ("What is the Role of Federal Assistance for Vocational Education?") had found that:

- . State plans were largely compliance documents;
- . Labor market data were not being realistically assessed or used;
- . Federal funds were often being used to maintain traditional programs of questionable value, rather than as a catalyst to achieve the programmatic initiatives called for by the law;
- . Large amounts of federal funds were being retained at the state level for administration; and
- . Federal funds were not being targeted to geographical areas of need or to the priority populations specified in the VEA.

In addition to these problems, Congress heard representatives of postsecondary education ask for increased involvement in the planning and operation of federally assisted vocational programs. Guidance and counseling interests sought greater emphasis on vocational guidance. Threading through all the testimony was a recognition of the need for programs designed to reduce sex stereotyping in vocational education.

Responding to these criticisms and concerns, in 1976 Congress amended the VEA so extensively as to constitute a rewrite of the entire law. These amendments are incorporated as Title II of P.L. 94-482, the Education Amendments of 1976, an omnibus bill covering several educational areas. P.L. 92-482 became effective as of October 1, 1977.

B. Priorities in the New Law

The priorities and concerns addressed in P.L. 94-482 match those the Council has had over the last several years. Among these concerns are:

1. the need for a concerted effort to assure that all who need or want occupational education have equal access to programs, with special attention being given to certain priority populations historically unserved or underserved (disadvantaged, minority, limited English-speaking, handicapped, female);
2. the need for a planning process, based on realistic economic and social data, reflecting a total educational policy for the Commonwealth, and leading to a document useful at the local level as a basis for developing programs;
3. the need for a re-allocation of federal vocational education funds, targeting them to geographic areas (urban and rural) containing relatively high concentrations of priority populations;
4. the need for an integrated approach to employment training and vocational education, emphasizing greater collaboration among all providers but especially between CETA and the Commonwealth's vocational education system; and
5. the need for an evaluation process which feeds back information useful to planners.

The new legislation is heavily oriented toward planning and evaluation, which reflects congressional dissatisfaction with results under the old law. While the old law did require states to submit an annual plan in order to be eligible for federal aid, it was repeatedly stressed during the congressional hearings that the plans being produced consisted of little more than the paperwork required to comply with the face of the statute. Few state plans could be used as a basis for programmatic decisions at the local levels, nor were they of much value to the U.S. Commissioner of Education in deciding whether or not to grant approval for federal funding. The new law attempts to improve on this situation by being far more prescriptive with respect to planning requirements.

Under P.L. 94-482, the state plans must set forth the overall manpower and vocational education goals the state intends to achieve during a five-year period, and it must include specific descriptions of the planned use of federal, state and local vocational education funds for each year. In using the term "specific" the Congress does not mean a projection for every vocational education dollar over a five-year period, but vague descriptions of "policies and procedures" are no longer acceptable. (See Appendix F for additional detail).

C. The Expanded Role of the Advisory Council

P.L. 94-482 re-emphasizes the important role of the Advisory Council by re-enforcing its participation in the development of the Five Year State Plan and Annual Program Plan. Not only is the Council's consultation role kept intact, but the law stipulates the creation of a new plan group and designates that one of ten mandated members be "a representative of the State Advisory Council on Vocational Education, designated by that Council." In addition to its planning role, the Advisory Council has these functions:

1. Advising the State Board on policy matters arising from program administration;
2. Monitoring and evaluating programs, services and activities funded under the Act;
3. Preparing and submitting an Annual Report including commenting on the State Commissioner's Annual Accountability Report;
4. Identifying, after consultation with the State Manpower Services Council, the vocational, employment and training needs of Massachusetts;
5. Having representation on the State Manpower Services Council; and
6. Providing technical assistance to the local advisory councils mandated under the Act.

Since the Council's role remains essentially advisory, its precise role in monitoring and evaluating vocational programs funded under the Act is subject to negotiation between the State Board and the Council.

D. The Council's Position on Planning

It is the Council's position on planning that vocational education policy, and the planning to implement it, should be based on two broad principles: (1) that vocational education is an integral part of a comprehensive educational system; and (2) that the most important feature of a vocational education delivery system is its ability to provide for the unique needs and varying abilities of individual students.

For planning purposes, the Commonwealth's vocational education "consumers" may be grouped as follows:

1. Those presently in vocational education programs;
2. Those presently in general education programs who do not plan to go on to additional training;
3. Those who have dropped out of high school;
4. Those who are unemployed or underemployed; and
5. Those who are out of school and employed, but who need re-training or upgrading.

Within each of these general categories, vocational education planners must anticipate the need for special programs for disadvantaged students (academic and economic), and for students who are unserved or underserved (ethnic and linguistic minorities, those with handicaps, urban and rural, and female).

It is the Council's position that the State Plan for vocational education should be a part of a total plan for public education. Moreover, vocational education policy should be seen not only as part of total educational policy, but also as part of a web of public policies aimed at economic growth, employment, reduction of poverty, equality of opportunity and social welfare. The mandate set forth in P.L. 94-482 to co-ordinate manpower and vocational education planning reflects a larger concern of the citizens of Massachusetts: that somehow, all social and economic policies be brought into harmony to form a coherent, cost-effective approach to the Commonwealth's problems. This approach requires the Board of Education to formulate policy with the benefit of concrete knowledge of the larger social and economic policy context within which vocational education must operate.

In addition to these global concerns, however, the Board must make its objectives for occupational education known in specific, operational terms so that the Department of Education, the Division of Occupational Education, local education agencies and other providers will be able to implement them. Thus, the Board's task is not easy: it involves deciding which problems need to be solved, which can be solved, and which should be solved first; it requires an understanding of how federal, state and local programs and resources affect the labor market and the educational system; and it implies hard choices concerning the allocation of limited resources.

The planning process consists of these minimum steps:

1. Policy formulation;
2. Establishing goals, objectives and priorities;
3. Formative and summative evaluation; and
4. Feedback and correction of the system based on evaluation results.

Key elements in the planning process are:

1. Specific persons identified in the Commissioner's office, in the Division of Occupational Education and in the regional offices, to co-ordinate planning and evaluation activities;
2. A communications network reporting back to the Board concerning local level needs, groups to be served, and problems; and
3. An evaluation system, built into the planning process and sophisticated enough to enable the Board to modify its objectives and priorities based on evaluation results.

The fundamental purpose of planning is the development of an explicit arrangement for guiding and controlling the work of a complex goal-seeking organization. There are planning models available from various sources, most of them in private industry, but implementing such models depends directly on (1) meaningful planning data, and (2) local level planning procedures. Neither of these preconditions is satisfied by the Commonwealth's present vocational education system, although the Council notes the beginning of a State Occupational Information Co-ordinating Committee, as required by P.L. 94-482.

The planning process should enable the Board and the Division to exercise greater leadership in moving all providers in the vocational education system toward programs and services which implement the Board's policy decisions. This should make it possible to carry through a strategy which uses the resources of vocational, academic, general and compensatory education toward meeting the student's total educational needs.

Observations Concerning the First State Plan Under P.L. 94-482

The Council views the planning process at the State level as promising: the Board's actions reflect increased interest in planning; the Division of Occupational Education appears to have made a serious commitment to planning; and, as a result of the new law, the environment for FY 78 should be more conducive to effective planning than it has been for many years.

While this last report under the old law is not the place to evaluate the Commonwealth's first plan under P.L. 94-482, the Council does wish to offer some general observations. Chief among these is the expectation that the Division of Occupational Education will be able to produce timely and accurate data concerning achievement of the objectives specified in the Five-Year and Annual State Plans. In the past, basic data on such things as enrollments, expenditures and completers has been unavailable, unreliable, or in a form that makes it useless for evaluation purposes. Since the new law is quite prescriptive with respect to accountability, the Division's responsibilities in the area of data gathering, analysis and dissemination have been increased.

A second observation is that the matter of putting an adequate planning mechanism in place merits the Board's continued close attention. The results now expected from the many parts of the Commonwealth's vocational education system require that the Board's policies, objectives and priorities be carried out expeditiously and with high visibility.

With respect to the planning mechanism itself, the Council has two central concerns. The first is that any well-formulated planning process must include an evaluation component which provides a means for integrating the lessons learned from one year's experience into subsequent goals and programs. We are aware that the Department of Education is continuing its major effort in the evaluation area, and we strongly urge the Division to begin immediately to develop an effective evaluation system within vocational education. We look forward to consulting with the Division in the design of such a system, as required by P.L. 94-482.

A second concern on the subject of planning is that it be opened up to input from the local level, to a degree even beyond the requirements of the federal law. The Council has been making this point for several years and, while the new planning sequence put into effect for FY 78 is an improvement, the Council believes it is possible to do a better job of considering the views of consumers and local providers.

A third observation on the State Plan for FY 78 is that it does not contain objectives specific to minorities. The issue of equal access for minorities is not specifically addressed in P.L. 94-482, although it is expected that the Office of Civil Rights will review the Five-Year Plan and Annual Program Plan for civil rights compliance. This is not to say, however, that the State Plan may not contain language appropriate to goals for minority groups, and we urge the Board to incorporate such references in subsequent plan revisions.

E. The Youth Employment Demonstration Projects Act of 1977
(YEDPA)

The YEDPA was signed into law on August 5, 1977 and initially funded with \$1 billion. The Act is a departure from programs broadly targeted at cyclical unemployment. It attempts to deal with the structural aspects of youth unemployment -- in particular the dramatically high unemployment rate for minority youth -- by encouraging CETA prime sponsors and the vocational education system to experiment with different program mixes and service delivery modes.

The Council believes that youth unemployment is a complex social problem which cannot be solved by the educational system alone, nor by the employment and training system, nor even by the two separate systems acting together in close cooperation. Long-term solutions to the chronic problem can be found only through the active involvement of all sectors of the community -- public and private, local, State and federal -- in analyzing the basic roots of the problem and then in agreeing on different and alternative ways to bring to bear the substantial resources that are available for effecting social change.

There is no question that the educational system, as it operates currently, is part of the problem. The schools need help in re-examining their function in relation to the social environment in which they operate, but it is that social environment as a whole which appears to engender the current discontinuity between the worlds of education and work. There are

many forces at work within our social structure over which the schools have little or no control -- parental attitudes, the communications media, and local, regional and national economic conditions -- all of which have a direct or indirect influence on the attitudinal and motivational development of our youth.

Similarly, the employment and training system is part of the problem. As it has been allowed to develop over the past 15 years, it is, at best, a salvage operation which concentrates its resources on treating the most obvious symptoms of the underlying malaise of unemployment and under-employment without having any lasting effect on the causes of the basic problem. The Comprehensive Employment and Training Act (CETA), which was intended to do away with the narrowly-focused categorical manpower programs of the 1960's and to give local governments greater flexibility in applying available resources to address local problems, has been converted in the last three years into a national program to combat rising unemployment by the creation of thousands of public service jobs. The important element of training, which was the keystone of the original legislation, has been virtually swamped by the ever-increasing emphasis on public service employment as a national policy tool for dealing with the immediate problem of economic recession.

In passing the Youth and Demonstration Projects Act of 1977 (P.L. 95-93), the Congress appears to have recognized the current limitations of both the educational and the employment and training systems to deal with youth unemployment on a long-term basis, and has written into the legislation its clear intent to encourage experimentation in program design and the development of exemplary projects which will explore new ways of coupling education and work-related programs through maximum inter-agency collaboration and the sharing of community resources. The legislation is, in a real sense, a large-scale research and demonstration program with a two-year limit; the drafting of future legislation in the areas of education and employment and training for youth could be influenced heavily by what happens under P.L. 95-93 during the next two years.

The Advisory Council, by legislative mandate, must be concerned about the apparent failure of our educational institutions to provide career development opportunities for their students.

Recognizing that the system which the Congress has designated to provide training and employment opportunities for youth is the federal-state-local network of prime sponsors created under the Comprehensive Employment and Training Act of 1973, the Advisory Council will focus its efforts and resources on helping to define and describe the contributions which Massachusetts schools can make to the CETA youth effort, utilizing the funds for in-school programs provided by the new legislation.

The Council will also want to ask the Board how it intends to maximize the use of funds available to the Commonwealth from the YEDPA for vocational education, and how these funds fit into the overall State Plan for vocational education.

APPENDICES

APPENDIX A

Council History

On March 1, 1969, His Excellency Francis W. Sargent, Governor of the Commonwealth of Massachusetts, appointed the first Massachusetts Advisory Council on Vocational-Technical Education. In compliance with P.L. 90-576 enacted by the 90th Congress of the United States, the Governor issued Executive Order #66 and later, Executive Order #79 creating this agency with the primary responsibilities focused on increasing the quality and quantity of occupational education in Massachusetts.

The first Council assumed its tasks in March 1969. Its membership, as required by law, was representative of the Commonwealth's geographic, ethnic, religious, educational, industrial political, organized labor, anti-poverty, and lay groups. In order to ensure continuity of interest and action for the future, one-third of the members were initially appointed for one year, one-third for two years, and one-third for three years. Subsequent appointments were for three years, except for those members appointed to fill vacancies occurring in the Council due to resignation or death.

The Council established its own policies and procedures, hired a staff and developed budget, fiscal and administrative procedures. Standing committees were appointed to concentrate on general areas of continuing concern and ad hoc committees were formed to solve problems of specific interest. Standing committees include the Plan and Evaluation Committees, relating to the two major functions of the Council and an Executive Committee authorized under amendments to the By-Laws, March 5, 1974.

The Council, as organized under Executive Order #66 and #79, is composed of twenty-four (24) gubernatorial appointees. The main activities engaged in by the Council may be summarized as follows:

1. Evaluation of vocational education programs, services and activities, and publishing and distributing the results thereof;

2. Prepare and submit through the State Board of Education to the U.S. Commissioner of Education and to the National Advisory Council on Vocational Education an Annual Report, accompanied by such additional comments of the State Board as the State Board deems appropriate, evaluating the effectiveness of vocational education programs, services and activities carried out in the year under review in meeting the program objectives set forth in the long-range plan and the Annual Plan prepared by the Department of Education. The Report also recommends such changes in programs, services and activities as may be warranted by the evaluation; and
3. Hold at least one public meeting at which the public will be allowed to express its views concerning vocational education.

To date, nine State Plans for occupational education have been formulated in consultation with the Council. The Council has compiled and distributed eight Annual Reports on occupational education, including this Report.

In April, 1974, the Council designated the Greater Lawrence Regional Vocational-Technical High School in Andover, Massachusetts as its new fiscal agent. This school continues to serve in that capacity.

APPENDIX B

Council Activities - July 1, 1976 - June 30, 1977

Council Meetings

During FY 77, the Advisory Council held six meetings in various locations, including Pittsfield, Massachusetts, in the far western part of the State. All Council meetings are open to the public. Staff and members attended the American Vocational Association Convention in Houston, the Western States Regional Meeting in Hawaii, two Joint Meetings of the National Advisory Council and State Advisory Councils in Minnesota and Washington, D.C., and other state and regional meetings.

In addition, the Council, with Region I of HEW and the Department of Education, sponsored two public hearings in Westfield and Boston concerning resolution of issues with respect to P.L. 94-482.

Committee Activities

1. Standing Committees

a. Evaluation - The Council continues to function as a committee of the whole regarding evaluation. The work of the committee results in the Annual Report.

b. Plan - With the passage of P.L. 94-482 in October, 1976, planning efforts were largely made through official and unofficial representation on the Plan Group, mandated by P.L. 94-482, Section 107. The product was the required Five-Year State Plan and Annual Program Plan specified under Sections 107 and 108 of P.L. 94-482.

c. Executive - The Executive Committee met six times during FY 77 on matters relating to Council business between regular Council meetings. The Executive Committee is also responsible for preparation of the Council's budget.

2. Ad Hoc Committees

The Council, during FY 77, continued to do a major portion of its work through ad hoc committees. In FY 77, committee activities focused on access for those with handicaps, access for linguistic minorities, educational costs, legislation, and lifelong learning, a new addition in mid-FY 77. The work of these committees is reflected in this Report.

Other Activities of Note

In FY 77, in connection with the objectives of the Education Cost and Access ad hoc committees, staff and members visited five programs. Results of the site visits are contained in this Report.

The Council held its Annual Meeting in July, 1977 to discuss FY 78 goals, objectives and priorities, and elected the following officers:

Bette V. Pinckney, Chairperson
Dorothy Sparrow, Vice-Chairperson
James Hammond, Treasurer

APPENDIX C

Council Members

Certified for 1976-1977

Dr. John Dinkelspiel, Chairperson
Ms. Bette V. Pinckney, Vice Chairperson
Mr. Franklin Ollivierre, Treasurer
*Mr. Hugh R. Boyd
Mr. John Griffin
Dr. James J. Hammond
Mr. David P. Hayes
Dr. Argelia Maria Buitrago Hermet
Ms. Lila Hexner
Mr. Robert J. Lamphere
Ms. Diane Lund
Mr. Sheldon W. Mender
Mr. Thomas C. O'Brien
Mr. Philip A. Pirrone
Dr. Albert C. Pryor
Mr. B.J. Rudman
Mr. John T. Ryan
Ms. Carrie B. Saunders
Ms. Delores J. Schoedel
*Ms. Dorothy G. Sparrow
Mr. Fred S. Tarbox
Mr. Joseph D. Warren
Mr. Burton I. Wolfman

New Appointees for FY 78

Dr. David C. Bartley
Mr. Evangel John Bredakis
Ms. Kim Burrell
Mr. Frank A. Hall
Mr. Charles H. Heyl
Dr. Ralph Jordan
Dr. Kenneth G. Ryder
Ms. Charlotte Scott
Ms. Laya Wiesner

Staff

Mr. Raymond C. Parrott, Executive Director
Ms. Kathleen DiAnni, Administrative Assistant
Ms. Janice Liva, Legal Research Assistant (resigned May, 1977)
Mr. Robert B. Borden, Research Director

* Term expired 1977, re-appointed for three years

ADVISORY COUNCIL ON VOCATIONAL-TECHNICAL EDUCATION

SUITE 352-354

294 WASHINGTON STREET

BOSTON, MASSACHUSETTS 02108

AREA CODE 617-727-4316

DATA/INTERVIEW GUIDESelect Cost and Access Committee
VisitsPurpose of Visit:

- 1) To provide Council members and staff, personal opportunity to review representative vocational programs funded under P.L. 90-576, in different facilities;
- 2) To gather pertinent cost and program information bearing on the effectiveness and quality of the program;
- 3) To have the opportunity to discuss with school administrators and program staff, goals/objectives of the program, intentions as to retaining the program after 90-576 funds run out, and to explore problem areas.

Time Appropriation:

- 1) Tour - 1/2 to 1 hour
- 2) Discussion 1-2 hours

Staff Work Required Prior to Visit:

- 1) Obtain original proposal submitted to the Division.
- 2) Obtain program/project evaluation sheet upon which decision to fund was made.
- 3) Obtain, if available, any interim reports, evaluations, etc. on the program/project.
- 4) Set up visits(schedule appointments).
- 5) Enlist members/staff for school visits.
- 6) Prepare brief program/project description for cost review team to read prior to visit.

School/Agency Data:

Name _____
Mailing address: _____

Supt/Director _____
Special Program _____
Administrator _____

Phone: _____

Communities served by special program:

Data Questions:

1) Funding awarded(90-576 funds) \$ _____

2) Cost breakout:

Administration \$ _____ Instruction \$ _____

Equipment \$ _____ Other \$ _____

3) In addition to federal funds, what other funds are(have been) committed to the program by source:

State \$ _____ LEA \$ _____ Other \$ _____

4) Date of initial funding _____

5) How many years has program/project been funded _____

6) Has school evaluated program Yes _____ No _____

In process _____ Being planned _____

7) Student facts:

a. number of students _____

b. number of males _____
number of females _____

c. student characteristics(disadvantaged, minority, etc.) _____

d. chronological age span of students _____

e. hours per day students spend in program: _____

academic placement _____
vocational placement _____

total _____

f. types of vocational opportunities available through training program: _____

8) Duration of program:

start of program(month, year) _____
completion of program _____

9) Placement record(if appropriate and available)

10) Details of employment(if appropriate and available)

11) Type of follow-up of program

12) Method/procedures/criteria of admission to program

- 13) Is the program likely to be continued? Funding plans? Same level? Expanded?
- 14) Student views on the program.
- 15) Obtain brochures, project descriptions, reports, other data on the program.
- 16) Any major problems/concerns? Kinds? Resolution?
- 17) Have Division or other Departmental staff provided technical assistance? Visited program? Evaluated the program? If so, when? Results?
- 18) Was an Advisory Committee established for the program? If so, what did it do? Does it still function?
- 19) Does a curriculum package (outline) exist? Get copies if available.
- 20) How was the need for the program determined? Process?

* * * * *

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August 11, 1977

Dr. David Cronin
Associate Commissioner
Division of Occupational Education
31 St. James Avenue
Boston, Massachusetts 02116

Dear David:

The Council for some time has been acutely aware of the sad state of vocational education in the City of Boston. As you said on Tuesday, August 9, at the hearing called on the scope and adequacy of vocational education, the City has had no incentive to use Chapter 74 funds due to the low percentage return and its inability to "capture" 15% money as the regional districts were once able to do.

The Council, too, is aware that the State, using federal funds from two sources, has attempted to provide added incentive although those federal funds have not been adequately utilized. The urban team approach has improved the situation to a modest degree but more has to be done.

It is our understanding that approximately 60-70% of anticipated FY 78 funds under P.L. 94-482 will be directed toward "urban" vocational education, but as 85% of the State is characterized by the Census as urban, it is difficult to conclude that critical inner-city (Boston, Springfield, etc.) needs will be met. It is also our understanding that approximately \$1 million is "earmarked" for Boston. We think the amount too low.

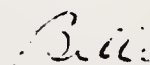
Of the five cities with over 100,000 population, only Boston has inadequate vocational programs and facilities. A detailed look at selective characteristics of the population of these five clearly demonstrates the urgency of resolving Boston's problem. It has the highest percentage of minority groups not only among the five over 100,000 but the eighteen cities with a population between 50,000-100,000. Boston has also a higher percentage of children between the ages of 10 and 19.

The Council would like to see a much higher amount of federal funds, in the neighborhood of \$3 million be so earmarked with a major effort undertaken to help the City draft good proposals and develop sound, effective programs. Given the nature of the City's

Dr. Cronin
Page Two
August 11, 1977

educational organization, we recognize that funding alone will not correct the problems nor remove logistic bottlenecks. We suggest that such added funds be provided if the City pledges a certain level of its own educational funds, let us say 80% federal, 20% local/state for FY 78; 60-40% for FY 79 and 50-50 for FY 80. We believe some incentive plus some promise from the City might go a long way to helping the City. And the Council is willing to assist in any way it can.

Sincerely yours,



Bette V. Pinckney
Chairperson

BVP:kad

APPENDIX F

Summary of Planning Requirements Under P.L. 94-482

To be eligible to receive funds, a state must maintain on file with the Commissioner a general application containing twelve assurances covering a broad range of administrative and fiscal matters. This application includes the assurance that in distributing funds the state will give priority to: (1) economically depressed areas and areas with high unemployment rates which are unable to meet the vocational needs of these areas without federal assistance, and (2) to programs which are new to the areas to be served and which meet new and emerging manpower needs. The state must also use as the two most important factors in distributing funds to local education agencies: (1) the relative financial ability to provide needed services and (2) the relative concentration of low income populations within such agencies. In the case of other eligible recipients, the state must use as the two most important factors the recipient's relative financial ability to provide needed services and the relative concentration of students it serves who impose higher than average costs (e.g. handicapped, disadvantaged, those with limited English-speaking ability).

The state must submit to the Commissioner by July 1, 1977, a Five-Year State Plan for fiscal years 1978 through 1982 and a second Five-Year State Plan by July 1, 1982 for fiscal years 1983 through 1987.

In formulating the Plan, the State Board is to actively involve a representative of the state agencies for secondary education, postsecondary vocational education, community and junior colleges, and institutions of higher education. The State Board must also involve representatives from local boards, vocational teachers, local school administrators, the State Manpower Services Council, the State Agency for Comprehensive Postsecondary Education Planning and the State Advisory Council. The State Board and these designated representatives must meet at least four times during the planning year. If these representatives are not able to agree on the contents of the State Plan, the State Board is responsible for reaching a final decision. In this event, the State Board must include in the Plan the recommendations rejected by the State Board and the reason for each rejection. Any dissatisfied agency may appeal the State Board's decision to the Commissioner. The Commissioner will then decide whether that State Plan is supported by substantial evidence, as shown in the State Plan, and will best carry out the purpose of P.L. 94-482.

The Five-Year State Plan must contain the procedures for carrying out certain assurances of the general application, as well as specific program provisions. These provisions include an assessment of employment opportunities in the state, the goals the state will seek to meet employment needs, the planned funding to meet employment needs, the intended uses of funds to meet specific program needs, the policies adopted by the state to eradicate sex discrimination, and a description of the mechanism established for co-ordination between manpower training programs and vocational education programs.

The planning process also includes the submission of an Annual Program Plan and an Annual Accountability Report. The procedural requirements for developing the Five-Year Plan are also applicable to the Annual Plan and Accountability Report, but the number of required planning meetings is reduced to three.

As for evaluation, the state must evaluate the effectiveness of each funded program within a five-year period. These evaluations must be in terms of the planning and operational processes, results of student achievement, results of student employment success and results of additional services that the state provides under the Act of special populations. Programs which purport to impart entry level job skills are to be evaluated according to the extent to which program completers and leavers find employment in related occupations and are considered well-trained by their employers.

Use of Federal Funds

Of the basic grant authorized under Subpart 2 of P.L. 94-482, 80% is permitted to be used for the following thirteen purposes:

1. Vocational education programs.
2. Work study programs.
3. Co-operative vocational education programs.
4. Energy education programs.
5. Construction of area vocational education school facilities.
6. Support of full-time personnel to promote and monitor programs designed to reduce sex stereotyping and sex bias in vocational education.
7. Provision of stipends for vocational education students with acute economic needs.

8. Placement services for students who have successfully completed vocational education programs.
9. Qualifying industrial arts programs.
10. Support services for women who enter programs designed to prepare individuals for occupations traditionally limited to men.
11. Day care services for children of students in secondary and postsecondary vocational education programs.
12. Vocational education for various situations in which persons need skills for full-time or changes of employment.
13. Construction and operation of residential vocational schools.

P.L. 94-482 also stipulates that not less than 20% of the basic grant must be used for the following six program areas:

1. Research.
2. Exemplary and innovative programs.
3. Curriculum development.
4. Guidance and counseling.
5. Pre-service and in-service training of teachers and administrators.
6. Programs to overcome sex bias and sex stereotyping.

Similar to the Vocational Education Amendments of 1968, a portion of the funds authorized under P.L. 94-482 is to be used for special programs for disadvantaged persons in areas with a high concentration of youth unemployment and school dropouts, and a portion of the funds to be used for consumer and home-making programs.

While P.L. 94-482 is generally constructed in a permissive way, there are a number of restrictive provisions requiring the expenditure of portions of funds allocated for specific purposes.

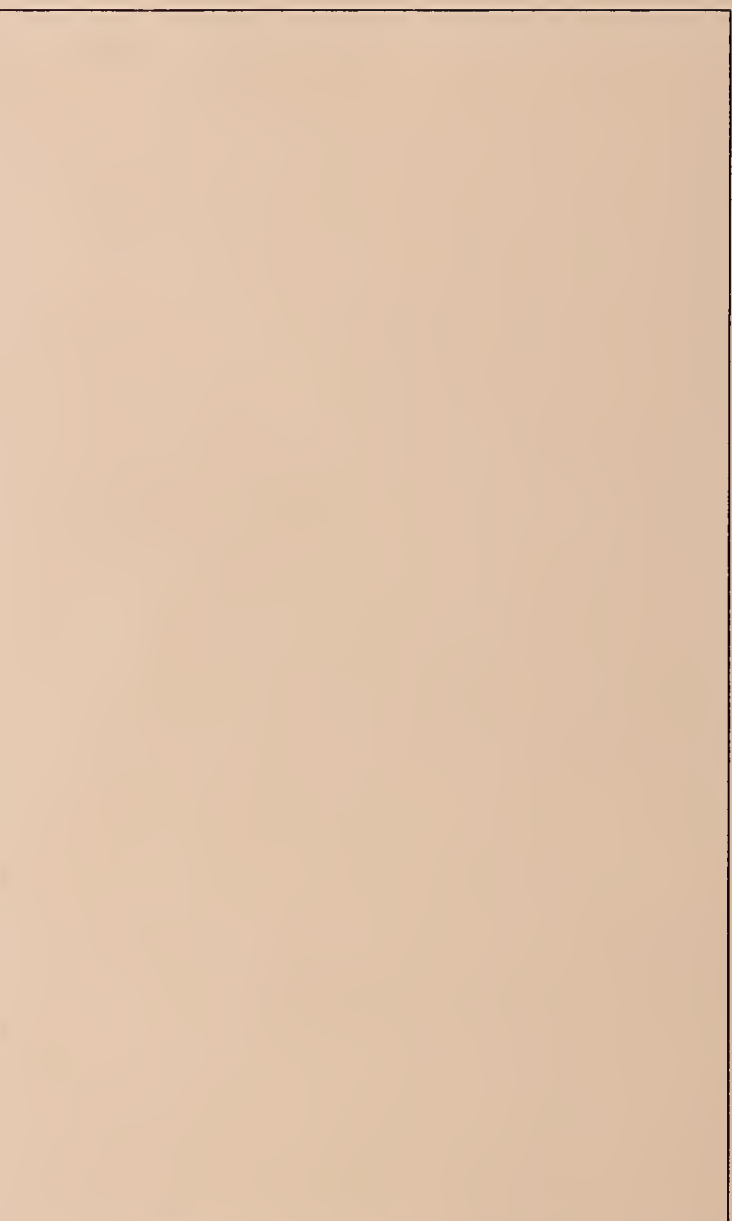
1. "...the State will continue to use approximately the same amount of its State grant under subpart 2...for programs in secondary schools during fiscal years 1978 and 1979 as it had used during fiscal years 1975 and 1976 unless the State is able to demonstrate in its Five-Year Plan the need to shift funds from such use."

2. The State must also document the reasons for the allocation of the basic grant among the thirteen alternative uses previously listed.
3. Each State must use at least \$50,000 per year for salaries of full-time personnel to promote and monitor programs designed to reduce sex stereotyping.
4. At least 15% of all grants under P.L. 94-482 must be used for persons who are either in an organized associate degree program or who have entered the labor market, are unemployed, or have completed or left high school.
5. With respect to programs for those with handicaps, 10% of the grants authorized under all subparts is restricted to such programs. There is some concern over this requirement, because it seems to run contrary to subpart 4, which stipulates that those funds be used entirely for disadvantaged programs. In addition, while previous funds for the handicapped have had no matching requirement, under the new Law the general 50% matching requirement applies to programs for the handicapped as well, effectively doubling the effort in this area.
6. Funds for programs for disadvantaged students have been increased from 15% to 20%. The 20% applies to all funds granted under all subparts, and the 50% matching requirement applies. There is an added requirement that a portion of these funds be used for students with limited English-speaking ability. The portion of funds used can be no less than the percentage of the disadvantaged funds equal to the percentage and population in the State, aged 15 to 24, having limited English-speaking ability.
7. Of the 20% basic grant funds to be used for the six program improvement and supportive services previously identified, not less than 20% must be used for vocational guidance and counseling.
8. P.L. 94-482 also identifies economically depressed areas as having high priority for fund allocation. The priority is particularly emphasized in connection with consumer and homemaking education grants, 1/3 of which must be used in economically depressed areas. Further priority is identified through a more liberal federal participation of 90% for programs in economically depressed areas.
9. There are numerous matching requirements in addition to those cited in numbers 1-8 above, beyond the generally applied 50% requirement. These will not be elaborated on here.

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